

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Bit Digital, Inc. Securities Litigation

Case No.: 1:21-cv-00515-ALC

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STIPULATION AND [PROPOSED] ORDER REGARDING CASE SCHEDULE

WHEREAS, Lead Plaintiff Joseph Franklin Monkam Nitcheu and Defendants Bit Digital, Inc., Min Hu, and Erke Huang (collectively, “Defendants”), by and through their counsel, hereby stipulate as follows:

WHEREAS, on March 8, 2021, the Court entered an order (ECF No. 6) granting the parties’ stipulation regarding Defendants’ time to respond to the complaint, ordering that “[a]fter the Court has appointed Lead Plaintiff and Lead Counsel for the putative Class, counsel for Defendants will confer with the court-appointed Lead Counsel to establish a schedule with respect to filing an amended complaint or a consolidated amended complaint, and any responsive pleadings or motions, and will jointly submit the same to the Court”;

WHEREAS, on April 29, 2021, the Court appointed Mr. Nitcheu as Lead Plaintiff and Block & Leviton LLP as Lead Counsel (ECF No. 21);

WHEREAS, in its April 29, 2021 Order, the Court ordered that the “parties shall file a joint status report proposing a schedule with respect to filing of an amended complaint or a consolidated amended complaint, and any responsive pleadings or motions by no later than May 7, 2021”; and

WHEREAS, counsel for Lead Plaintiff and Defendants have now conferred and agreed upon a schedule;

IT IS HEREBY STIPULATED AND AGREED, and respectfully requested among the parties, through their undersigned counsel, that the Court order:

1. Lead Plaintiff shall file an Amended Complaint within 60 days of the entry of this Stipulation by the Court;
2. Defendants shall answer or otherwise respond to the Amended Complaint 60 days after it is filed;
3. Should Defendants move to dismiss the Amended Complaint, Lead Plaintiff's opposition shall be due 30 days after the filing of Defendants' motion; and
4. Defendants' reply, if applicable, shall be filed 30 days following Lead Plaintiff's opposition.

Dated: New York, New York
May 6, 2021

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Attorneys for Defendants

So Ordered on this ___ day of _____ 2021:

Hon. Andrew L. Carter, Jr.
United States District Court Judge